## REMARKS

Reconsideration of this application, as amended, is respectfully requested.

Claims 1-52 are pending. Claims 1-52 stand rejected.

Claims 1, 19, 31, 38, 39, 43, 45-48, and 50 have been amended. No claims have been canceled. No claims have been added. Support for the amendments is found in the specification, the drawings, and in the claims as originally filed. Applicants submit that the amendments do not add new matter.

Applicants reserve all rights with respect to the applicability of the Doctrine of Equivalents.

Claims 1, 9, 10, 15, 19, 24, 25, 29, 30, 31, 33, 34, 37, 38, 41, 44, 49, 50 and 52 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,867,821 of Ballantyne et al. ("Ballantyne").

Amended claim 1 reads as follows:

A method comprising:

representing a first collection of media objects on a first sheet having a first graphical content representing the media objects, wherein the first sheet is a cover sheet that provides access to the first collection of the media objects, wherein the cover sheet is a non-electronic medium;

creating a second collection of media objects from the first collection of media objects; and

re-marking the first sheet that includes printing a second graphical content representing the second collection of media objects onto the first sheet using a printer, such that the second graphical content is presented on the first sheet in a non-electronic form, wherein the re-marked first sheet including the second graphical content in the non-electronic form provides access to the second collection of the media objects.

(emphasis added)

Ballantyne discloses entering the new information through the PDA technology by writing on the pen display tablet (col. 14, lines 23-25). In particular, Ballantyne discloses that "the monitor is either that of a Cathode Ray Tube (CRT), Liquid Crystal Display (LCD), or

newer technologies such the diamond-based video and computer display panels."(col. 11, lines 28-30).

Thus, Ballantyne merely discloses displaying the information on the computer monitors. In contrast, amended claim 1 refers to representing a first collection of media objects on a first sheet having a first graphical content representing the media objects, wherein the first sheet is a cover sheet that provides access to the first collection of the media objects, wherein the cover sheet is a non-electronic medium.

Accordingly, Ballantyne fails to disclose re-marking the first sheet that includes <u>printing</u> a second graphical content representing the second collection of media objects onto the first sheet that is a non-electronic medium, <u>using a printer</u>, such that the second graphical content is presented on the first sheet in a non-electronic form, wherein the re-marked first sheet including the second graphical content in the non-electronic form provides access to the second collection of the media objects, as recited in amended claim 1.

Because Ballantyne fails to disclose all limitations of amended claim 1, applicants respectfully submit that claim 1, as amended, is not anticipated by Ballantyne under 35 U.S.C. § 102(b).

Given that claims 9, 10, 15, 19, 24, 25, 29, 30, 31, 33, 34, 37, 38, 41, 44, and 49 contain limitations that are similar to those limitations discussed above with respect to amended claim 1, applicants respectfully submit that claims 9, 10, 15, 19, 24, 25, 29, 30, 31, 33, 34, 37, 38, 41, 44, and 49 are not anticipated by Ballantyne under 35 U.S.C. § 102(b).

With respect to amended claim 50, as set forth above, Ballantyne merely discloses displaying the information on the computer monitors. In contrast, amended claim 50 refers to erasing a portion of a sheet having a non-electronic representation of a collection of media

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objects, wherein the sheet is a non-electronic medium; and printing, using a printer, a second graphical content onto the sheet in a non-electronic form.

Ballantyne fails to disclose erasing a portion of a sheet having a non-electronic representation of a collection of media objects, wherein the representation includes a first graphical content to represent the media objects in a non-electronic form, wherein the sheet is a cover sheet including the first graphical content in the non-electronic form that provides access to the collection of the media objects, wherein the sheet is a non-electronic medium; and marking the portion of the sheet with updated information that includes <u>printing</u>, <u>using a printer</u>, a second graphical content onto the sheet in a non-electronic form, as recited in amended claim 50.

Because Ballantyne fails to disclose all limitations of amended claim 50, applicants respectfully submit that claim 50, as amended, is not anticipated by Ballantyne under 35 U.S.C. § 102(b).

Given that claim 52 contains limitations that are similar to those limitations discussed above with respect to amended claim 50, applicants respectfully submit that claim 52 is not anticipated by Ballantyne under 35 U.S.C. § 102(b).

Claim 46 stands rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Publication No. US2002/0052888 of Sellen et al. ("Sellen").

Amended claim 46 reads as follows:

A method comprising:

determining whether a document is erasable that includes

scanning a portion of the document to obtain first scanned data, wherein the portion of the document includes a content in a non-electronic form, wherein the document is a non-electronic medium;

storing the first scanned data in a memory;

performing, using a peripheral device, an erasing operation on the scanned portion of the document that includes the content in the non-electronic form at the location of the portion;

scanning the erased portion of the document to obtain second scanned data; and determining whether the non-electronic medium is erasable based on the first and second scanned data.

(emphasis added)

Sellen discloses the following:

to compare the paper version of the document and the stored version and to <u>produce a revised document</u> incorporating any changes made to the stored version and any annotations made to the paper version...

(paragraph [0036]).

Thus, Sellen merely discloses producing a revised document. In contrast, amended claim 46 refers to performing, using a peripheral device, an erasing operation on the scanned portion of the document that is a non-electronic medium that includes the content in the non-electronic form at the location of the portion.

Sellen fails to disclose performing, using a peripheral device, an erasing operation on the scanned portion of the document that is a non-electronic medium that includes the content in the non-electronic form at the location of the portion; and determining whether the non-electronic medium is erasable based on the first and second scanned data, as recited in amended claim 46.

Because Sellen fails to disclose all limitations of amended claim 46, applicants respectfully submit that claim 46, as amended, is not anticipated by Ballantyne under 35 U.S.C. § 102(b).

Claim 47 stands rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Publication No. US2002/0064113 of Geeslin et al. ("Geeslin").

Amended claim 47 reads as follows:

detecting a writable mark when scanning a re-writable paper, wherein the writable mark includes a shape placed on the re-writable paper in a non-electronic form, wherein the re-writable paper is a non-electronic medium; preventing modification to the re-writable paper that includes preventing from printing, using a peripheral device, on the re-writable paper in response to detecting the writable mark.

(emphasis added)

Geeslin, in contrast, discloses setting a protection state byte to indicate a protection state of the optical disk (paragraphs [0032]-[0033]). The optical disk is an electronic medium. In contrast, amended claim 47 refers to detecting a writable mark when scanning a re-writable paper, wherein the writable mark includes a shape placed on the re-writable paper in a non-electronic form, wherein the re-writable paper is a non-electronic medium.

Accordingly, Geeslin fails to disclose detecting a writable mark when scanning a rewritable paper, wherein the writable mark includes a shape placed on the re-writable paper in a non-electronic form, wherein the re-writable paper is a non-electronic medium; and preventing modification to the re-writable paper that includes preventing from printing, using a peripheral device, on the re-writable paper that is the non-electronic medium in response to detecting the writable mark.

Because Geeslin fails to disclose all limitations of amended claim 47, applicants respectfully submit that claim 47, as amended, is not anticipated by Geeslin under 35 U.S.C. § 102(b).

Claims 2-8, 12, 13, 20-23, 27, 28, 32, 36, 39, 40, 42, 43, 45, and 48 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ballantyne, in view of U.S. Patent No. 6,396,598 of Kashiwagi et al. ("Kashiwagi").

As set forth above, Ballantyne fails to disclose re-marking the sheet that includes printing, using a printer, a graphical content representing the collection of media objects onto the first sheet that is a non-electronic medium, such that the second graphical content is presented on the sheet in a non-electronic form, wherein the re-marked first sheet including the second graphical content in the non-electronic form provides access to the collection of the media objects, as recited in amended claim 1.

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Kashiwagi, in contrast, discloses electronically acquiring an electronic memo to a document (Abstract). Kashiwagi fails to disclose, teach, or suggest printing, using a printer, a second graphical content representing the second collection of media objects onto the <u>first sheet that is the non-electronic medium</u>, such that the second graphical content is presented on the sheet in a non-electronic form, wherein the re-marked first sheet including the second graphical content in the non-electronic form provides access to the collection of the media objects, as recited in amended claim 1.

Furthermore, even if Kashiwagi and Ballantyne were combined, such a combination would still lack <u>printing</u>, <u>using a printer</u>, a second graphical content representing the second collection of media objects onto the <u>first sheet that is the non-electronic medium</u>, such that the second graphical content is presented on the sheet in a non-electronic form, wherein the remarked first sheet including the second graphical content in the non-electronic form provides access to the collection of the media objects, as recited in amended claim 1.

Given that claims 2-8, 12, 13, 20-23, 27, 28, 32, 36, 43, 45, 48 contain the limitations that are similar to those limitations discussed with respect to amended claim 1, applicants respectfully submit that claims 2-8, 12, 13, 20-23, 27, 28, 32, 36, 43, 45, 48 are not obvious under 35 U.S.C. § 103(a) over Ballantyne in view of Kashwagi.

Amended claim 39 reads as follows:

## An apparatus comprising:

a scanner to scan a sheet having a first collection of media objects represented by graphical content on the sheet in a non-electronic form, wherein the sheet is a cover sheet that provides access to the first collection of the media objects, wherein the cover sheet is a non-electronic medium;

an erasing unit coupled to receive the sheet from the scanner to erase the graphical content in the non-electronic form the sheet;

a processing unit to modify the first collection of media objects by adding one or more pages of the one or more other media objects to the first collection of media objects to create a second collection of media objects;

a marking unit to re-mark the sheet that includes a printer to print a new identifier and new graphic content representing the second collection of media object onto the sheet in a

non-electronic form, wherein the re-marked first sheet including the new identifier and the new graphic content in the non-electronic form provides access to the second collection of the media objects.

(emphasis added)

As set forth above, Ballantyne fails to disclose a marking unit to re-mark the sheet, which is a non-electronic medium, wherein the marking unit includes a printer to print a new identifier and new graphic content representing the second collection of media object onto the non-electronic medium in a non-electronic form, wherein the re-marked first sheet including the new identifier and the new graphic content in the non-electronic form provides access to the second collection of the media objects, as recited in amended claim 39.

Kashiwagi, in contrast, discloses electronically acquiring an electronic memo to a document (Abstract).

Furthermore, even if Kashiwagi and Ballantyne were combined, such a combination would still lack a marking unit to re-mark the sheet, which is a non-electronic medium, wherein the marking unit includes a printer to print a new identifier and new graphic content representing the second collection of media object onto the non-electronic medium in a non-electronic form, wherein the re-marked first sheet including the new identifier and the new graphic content in the non-electronic form provides access to the second collection of the media objects, as recited in amended claim 39.

Therefore, applicants respectfully submit that claim 39, as amended, is not obvious under 35 U.S.C. § 103(a) over Ballantyne in view of Kashiwagi.

Given that claims 40 and 42 contain the limitations that are similar to those limitations discussed with respect to amended claim 39, applicants respectfully submit that claims 40 and 42 are not obvious under 35 U.S.C. § 103(a) over Ballantyne in view of Kashwagi.

Claims 11, 26, and 35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ballantyne, in view of U.S. Patent No. 3,713,148 of Cardullo et al. ("Cardullo").

Cardullo, in contrast, discloses a transponder apparatus, and similar to Ballantyne, fails to disclose, teach, or suggest the discussed above limitations of amended claim 1.

Furthermore, even if Cardullo and Ballantyne were combined, such a combination would still lack printing a graphical content representing the collection of media objects onto the first sheet using a printer, wherein the first sheet is a non-electronic medium, such that the second graphical content is presented on the sheet in a non-electronic form, wherein the re-marked first sheet including the second graphical content in the non-electronic form provides access to the collection of the media objects, as recited in amended claim 1.

Given that claims 11, 26, and 35 contain the limitations that are similar to those limitations discussed with respect to amended claim 1, applicants respectfully submit that claims 11, 26, and 35 are not obvious under 35 U.S.C. § 103(a) over Ballantyne in view of Cardullo.

Claims 16-18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ballantyne, in view of U.S. Patent No. 6,260,063 of Ludtke et al. ("Ludtke").

Ludtke, in contrast, discloses representing devices within a network. Ludtke fails to disclose, teach, or suggest the discussed above limitations of amended claim 1.

Furthermore, even if Cardullo and Ballantyne were combined, such a combination would still lack printing a graphical content representing the collection of media objects onto the first sheet using a printer, wherein the first sheet is a non-electronic medium, such that the second graphical content is presented on the sheet in a non-electronic form, wherein the re-marked first sheet including the second graphical content in the non-electronic form provides access to the collection of the media objects, as recited in amended claim 1.

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Given that claims 16-18 contain limitations that are similar to those limitations discussed

with respect to amended claim 1, applicants respectfully submit that claims 16-18 are not

obvious under 35 U.S.C. § 103(a) over Ballantyne in view of Ludtke.

Claim 51 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Ballantyne,

in view of U.S. Publication No. US2002/0052888 of Sellen et al. ("Sellen").

For at list the reasons that are similar to those reasons discussed above with respect to

amended claims 46, and 50, applicants respectfully submit that claim 51 is not obvious under 35

U.S.C. § 103(a) over Ballantyne in view of Sellen.

It is respectfully submitted that in view of the amendments and arguments set forth

herein, the applicable rejections and objections have been overcome. If the Examiner believes a

telephone conference would expedite or assist in the allowance of the present application, the

Examiner is invited to call the undersigned attorney at (408) 720-8300.

If there are any additional charges, please charge Deposit Account No. 022666.

Respectfully submitted,

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